

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)
) Criminal No. 16-cr-055
v.) (Case No. 2:16-CR-00055-DWA)
) (The Honorable Donetta W. Ambrose)
SIMON TUSHA)

DEFENDANT SIMON TUSHA'S MOTION TO CONTINUE SENTENCING
DATE

COMES NOW, the Defendant SIMON TUSHA, by his attorneys, GREENFIELD & KRAUT, and STANLEY W. GREENFIELD, Esquire, and moves the Court for an order continuing his sentencing, now scheduled for July 11, 2017 at 12:00 P.M., to October 09, 2017, or such other time which suits the convenience of the Court, for the reason that, under the terms of his plea agreement with the USA, for a 5K motion, the Defendant has yet to complete his cooperation and testify in the Netherlands by arrangement with Dutch authorities, the date for which has not yet been scheduled.

WHEREFORE, Defendant, SIMON TUSHA, requests an Order continuing his sentencing date, scheduled for July 11, 2017, to October 09, 2017.

Respectfully submitted,

GREENFIELD & KRAUT

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